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August 14, 2023

<u>VIA E-MAIL</u>
The Honorable Laura Taylor Swain
Chief United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

<u>MEMO ENDORSED</u>

Re: *United States v. Gregoire Tournant*, 22-cr-276 (LTS)

Dear Chief Judge Swain:

We respectfully submit this letter pursuant to the Court's August 3, 2023 Order directing the parties to inform the Court of any requested redactions to the Court's Opinion and Order denying Mr. Tournant's motion to dismiss. (*See* ECF No. 79.) Defendant Gregoire Tournant requests that limited portions of the Court's Opinion and Order remain under seal and are redacted from the publicly filed Opinion and Order. Attached please find a copy of the Court's Opinion and Order with his proposed redactions highlighted on pages 6, 7, and 16. The portions of the Opinion and Order that Mr. Tournant requests remain under seal relate to the substance of communication between Mr. Tournant and his counsel, which Mr. Tournant respectfully contends are protected by the attorney-client privilege. Mr. Tournant respectfully requests that the Court preserve the confidentiality of this information to prevent substantial prejudice to Mr. Tournant for any and all future proceedings in this matter.

We thank the Court for its consideration.

Respectfully submitted,

/s/ Seth L. Levine
Seth L. Levine
Alison M. Bonelli

cc: Daniel R. Alonso, Esq.
        Lisa Korologos, Esq.
        Derek Wikstrom, Esq.

Because the Court ruled in its August 3, 2023 Opinion that the communications Mr. Tournant seeks to redact are not protected by the attorney-client privilege, the redactions request is denied. The Court hereby directs the unsealing and filing of the full unredacted Opinion, which is dated August 3, 2023, on the public docket. DE 82 is resolved.
SO ORDERED.
8/15/2023 /s/ Laura Taylor Swain, Chief USDJ